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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

EDWARD B. DOUGLAS, an individual,  
  
Plaintiff,

v.

DREAMDEALERS USA, LLC d/b/a Exotics  
Racing, a Nevada limited liability company,  
DAVID PERISSET, an individual, and  
ROMAIN THIEVIN, an individual,  
  
Defendants.

Case No. 2:17-cv-02134-APG-BNW

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TIME TO  
RESPOND TO MOTION TO RE-OPEN  
DISCOVERY [ECF No. 51]**

**(First Request)**

Plaintiff, EDWARD B. DOUGLAS (“Plaintiff”), and Defendants, DREAMDEALERS USA, LLC, DAVID PERISSET, and ROMAN THIEVIN (collectively “Defendants”), hereby agree and stipulate to extend by two days the time for Plaintiff to respond to Defendants’ Motion to Re-open Discovery, ECF No. 51, from the current deadline of January 21, 2020 up to and including January 23, 2020. This is the first request to extend the time for Plaintiff to respond to Defendants’ Motion to Re-open Discovery, which was filed on January 7, 2020.

Good cause exists to grant this stipulation and extend the response deadline by two days. In particular, Plaintiff has been out of state attending medical appointments with his wife as she seeks treatment related to breast cancer and a traumatic brain injury. Plaintiff has also been out of state taking care of an elderly family member facing significant medical issues and requiring end-

1 of-life care. Accordingly, the requested extension is sought in good faith and not for purposes of  
2 undue delay.

3 DATED: January 21, 2020

DATED: January 21, 2020

4 Respectfully submitted,

Respectfully submitted,

5 CLARK LAW COUNSEL PLLC

LITTLER MENDELSON, P.C.

6 /s/ Dustin L. Clark

/s/ Marcus B. Smith

7 Dustin L. Clark  
8 Attorney for Plaintiff

Wendy M. Krincek  
Marcus B. Smith  
Attorney for Defendants

11 IT IS SO ORDERED.

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14 UNITED STATES MAGISTRATE JUDGE

15 1/22/2020  
16 DATED: \_\_\_\_\_  
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